

SCHWARTZ PERRY HELLER <sup>LLP</sup>

3 PARK AVENUE, 27<sup>TH</sup> FL. NEW YORK, NY 10016  
T: 212.889.6565 | F: 212.779.8208 | SPHLEGAL.COM

---

February 8, 2024

**Via ECF**

Judge Eric N. Vitaliano  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Lieberman v. C.A. Goldberg, PLLC, & Carrie A. Goldberg  
1:21-cv-05053-ENV-RER**

Dear Judge Vitaliano:

I represent the Plaintiff in the above-referenced action. As I did on November 8, 2023, I write to respectfully follow up with the Court on two outstanding motions in this case, namely: (1) Plaintiff's motion to dismiss the counterclaim of Defendant C.A. Goldberg, PLLC, which was filed on September 12, 2022; and (2) Defendants' motion for summary judgment, which was filed on September 16, 2023.

We thank the Court for its consideration of this matter.

Respectfully,

  
BRIAN HELLER

cc: All counsel – via ECF